

Sent via E-mail to memberinput@iccsafe.org

January 8, 2021

RE: Public Comment Period on the IECC

Dear ICC Board of Directors,

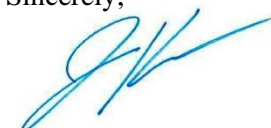
The Polyisocyanurate Insulation Manufacturers Association (PIMA) is pleased to submit this comment letter concerning the proposed changes to the development process for the International Energy Conservation Code (IECC). PIMA is an active participant in the development of the ICC family of codes. Our support for the ICC and its code development process is evidenced by our Association's participation at the code hearings as well as individual service on the code development committees.

PIMA is concerned that the decision to use the Council's Consensus Standard Procedures to develop the 2024 version of the IECC is being made under an accelerated timeline that does not allow for the full and fair participation of affected stakeholders. While we appreciate the opportunity to comment on the proposal, PIMA strongly encourages the ICC to extend the existing comment period and provide additional explanation of the proposal prior to a new public comment deadline. This will ensure that the Council's decision is guided by its long-standing principles of openness and transparency, and will avoid shrouding any final decision in suspicion.

Our concerns go beyond the procedural aspects of the Board's decision. In responses to stakeholders and in other public statements, ICC has defended the recommendation to abandon the Governmental Consensus Process by stating that new procedures are necessary to ensure that the IECC can meet the climate challenges of tomorrow. The goal of positioning the IECC as a critical tool to combat climate change and drive additional improvements to building energy efficiency should be lauded. However, since the 2009 IECC, the Governmental Consensus Process has resulted in significant improvements to the stringency of the energy code requirements for commercial and residential buildings. This result does not support ICC's conclusion that the proposed change is required in order to do more. More troubling is the fact that certain proponents of the proposed change are the same entities that consistently oppose improvements to the stringency of the energy code. The Council's rationale for the proposed change can easily be interpreted as inventing a solution for a problem created by a powerful stakeholder that stands to uniquely benefit if the proposal is adopted.

The circumstances warrant a more complete debate of the proposed change to the IECC development process. PIMA looks forward to engaging with the ICC leadership and appreciates the Board's consideration of our public comment letter.

Sincerely,



Justin Koscher, President